

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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**This document relates to: New York Marine and General Insurance Co. v.
Al Qaida, et al. (04-CV-6105)**

**NOTICE OF MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(b)(2) and 12(b)(6)
BY DEFENDANT IBRAHIM BIN ABDUL AZIZ AL-IBRAHIM FOUNDATION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion To Dismiss of Defendant Ibrahim Bin Abdul Aziz Al-Ibrahim Foundation, the attached declaration of Daniel L. Brown dated October 3, 2005, and all prior pleadings and proceedings herein, Defendant Ibrahim Bin Abdul Aziz Al-Ibrahim Foundation, by its attorneys Sheppard Mullin Richter & Hampton LLP, will move this Court on _____, 2005, at _____ a.m./ p.m., or as soon thereafter as counsel may be heard, before the Honorable Richard C. Casey, United States District Judge, United States District Court for the Southern District of New York, at the United States Court House, 500 Pearl Street, New York, New York, for an Order pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing all claims against Defendant Ibrahim Bin Abdul Aziz Al-Ibrahim Foundation in the above-referenced action with prejudice, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
October 4, 2005

Respectfully submitted,
SHEPPARD MULLIN RICHTER & HAMPTON LLP

By: _____/s/_____
James J. McGuire (JM-5390)

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